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Attorneys for Specially Appearing Defendants  
Fenix International Limited and Fenix Internet LLC

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,  
individually and on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

FENIX INTERNATIONAL  
LIMITED, FENIX INTERNET LLC,  
BOSS BADDIES LLC, MOXY  
MANAGEMENT, UNRULY  
AGENCY LLC (also d/b/a DYSRPT  
AGENCY), BEHAVE AGENCY  
LLC, A.S.H. AGENCY, CONTENT  
X, INC., VERGE AGENCY, INC.,  
AND ELITE CREATORS LLC,

Defendants.

CASE NO.: 8:24-cv-01655-FWS-SSC

**DECLARATION OF RAZA RASHEED  
IN SUPPORT OF SPECIALLY  
APPEARING DEFENDANTS FENIX  
INTERNATIONAL LIMITED'S AND  
FENIX INTERNET LLC'S MOTION  
FOR PARTIAL RECONSIDERATION  
OR ALTERNATIVELY  
CERTIFICATION OF AN  
INTERLOCUTORY APPEAL**

Judge: Hon. Fred W. Slaughter  
Courtroom: 10D  
Date: August 28, 2025  
Time: 10:00 a.m.

**DECLARATION OF RAZA RASHEED**

I, Raza Rasheed, declare and state as follows:

1. I am an attorney admitted to practice before the courts of the State of California and have been admitted to this Court. I am a counsel in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, which represents Specially Appearing Defendants Fenix International Limited and Fenix Internet LLC (together, “Fenix Defendants”). I submit this declaration in support of the Fenix Defendants’ Motion for Partial Reconsideration or Alternatively Certification of an Interlocutory Appeal (the “Motion”). This declaration is based on my own personal knowledge and if called upon to do so, I could and would testify competently thereto.

2. On July 23, 2025, I met and conferred via telephone with counsel for the Plaintiffs, Leonard Aragon, regarding the substance of the Motion and potential resolution. I explained Fenix Defendants’ position that the Court should either (1) partially reconsider its April 9 Order granting in part and denying in part Fenix Defendants’ Motion to Dismiss, or (2) certify the issue for interlocutory appeal. I explained Fenix Defendants’ position that partial reconsideration or interlocutory appeal is justified in light of the California Supreme Court’s July 21, 2025 decision in *EpicentRx, Inc. v. Superior Court*, --- P.3d ---, No. S282521, 2025 WL 2027272 (Cal.), which reversed, disapproved, or limited the California authorities upon which the Court’s Order relied. Plaintiffs indicated that their position would likely be to oppose any reconsideration or interlocutory appeal. The parties were unable to reach a resolution that eliminated the necessity of bringing the Motion.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an article by Robert H. Klonoff titled “Why Most Nations Do Not Have U.S.-Style Class Actions” that was published in Bloomberg Law on May 22, 2015. A copy of this article was obtained at my direction by downloading it from Bloomberg Law, and the article is publicly available online at <https://news.bloomberglaw.com/class-action/why-most-nations-do-not-have-us-style-class-actions>.

1 I declare under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct.

3 Executed on July 31, 2025, in Los Angeles, California.

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5 By: /s/ Raza Rasheed  
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